



U.S. Department of Justice

*United States Attorney  
Southern District of New York*

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*The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278*

May 24, 2024

**BY ECF**

Honorable Jennifer G. L. Clarke  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *United States v. Anton Peraire-Bueno, et al.*, 24 Cr. 293 (JGLC)

Dear Judge Clarke:

The Government writes on behalf of the parties regarding the status of the above-referenced matter in response to the Court's request dated May 23, 2024.

On May 23, 2024, defendants Anton Peraire-Bueno ("Anton") and James-Peraire-Bueno ("James") appeared before Magistrate Judge Jennifer Willis. Defendant Anton was presented and arraigned on the charges in the Indictment. A status conference was set for August 19, 2024, at 11:00 a.m. On consent of the parties and pursuant to 18 U.S.C. § 3161(h)(7), time was excluded until August 19, 2024. On May 24, 2024, the parties filed a proposed protective order.

With respect to discovery, subject to the entering of a protective order, the Government anticipates making an initial production the week of June 3. The initial production will include, among other items, warrant affidavits, arrest materials, open-source materials, and subpoena returns. Absent any unforeseen technical issues relating to device extraction, document exporting, and privilege screens, the Government anticipates making rolling productions of electronically stored information ("ESI") materials beginning within approximately three weeks. These materials consist primarily of Google Drive search warrant returns; electronic device search warrant returns for which the Government has been able to access; and other cloud storage search warrant returns, which the Government anticipates receiving from various providers within the next thirty days.

At the August 19, 2024 status conference, the Government anticipates requesting a pretrial motion briefing schedule and a trial date.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by: /s/ Danielle Kudla  
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Cc: Defense Counsel (by ECF)